

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Mattie Nell McGee, Debtor

**Case No. 20-51055-KMS
Chapter 13**

**DEBTOR'S CERTIFICATION AND MOTION FOR ENTRY OF CHAPTER 13
DISCHARGE PURSUANT TO 11 U.S.C. §1328 (a) and (h)**

This motion seeks an order discharging the debtor(s) pursuant to § 1328(a) of the bankruptcy code. If you oppose this motion, you must file a response with the court within twenty-one (21) days from the date listed below in the certificate of service. Your response must set forth the specific factual allegations with which you disagree, and a copy of your response must be served on the debtor(s) and debtor's(s') attorney. If no timely response is filed, the court may grant this motion without holding a hearing. A timely response is necessary for a hearing to be held.

1. By signing below, the debtor certifies under penalty of perjury that the following statements are true and correct:
 - A. For cases filed on or after March 10, 2008, I have completed a personal financial management instructional course provided through an agency approved by the United States Trustee and have filed the certificate of completion provided by the course provider (in a joint case, both husband and wife must each complete the course and file a certificate of completion) or the approved personal financial management course provider has notified the court that I have completed a post-petition instructional course concerning personal financial management. **11 U.S.C. § 1328(g)**
 - B. All pre-petition amounts owed by me on domestic support obligation (“Domestic Support Obligation” as defined at 11 U.S.C §101(14A)), if any, have been paid to the extent provided by the plan. All post-petition amounts owed by me on a domestic support obligation, if any, have been paid. **11 U.S.C §1328(a)**
 - C. I have not received a discharge under chapter 7, 11 or 12 of the Bankruptcy Code in a prior case filed during the four-year period preceding the date that the petition was filed in this case. **11 U.S.C. §1328(f)(1)**
 - D. I have not received a discharge under chapter 13 of the Bankruptcy Code in a prior case filed during the two-year period before the date that the petition was filed in this case. **11 U.S.C. §1328(f)(2)**
 - E. I have not been convicted of a felony, the circumstances of which would demonstrate that the filing of this bankruptcy case constituted an abuse of the provisions of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(A)**
 - F. If I owe a debt arising from: (i) any violation of any State or Federal securities laws, regulations or orders, (ii) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security, (iii) a civil remedy under 1964 of Title 18 of the United States Code, or (iv) that caused serious injury or death to another individual in the preceding five (5) years, in the preceding five (5) years, then I have not claimed an exemption for my/our residence in an amount in excess of the statutory cap as

prohibited by §522(q)(1) of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(B)**

G. No proceeding is pending in which I may be found guilty of a felony of the kind described in §522(q)(1)(A) or in which I may be found liable for a debt of the kind described in §522(q)(1)(B). **11 U.S.C. §1328(h)(2)**

H. I have made all payments required by my confirmed Chapter 13 plan.

2. Debtor hereby moves the court for the entry of a discharge order in this case.

Signed: /s/ Mattie Nell McGee
Mattie Nell McGee

06/16/2025
Date

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., MS Bar No. 103469
Attorney for the Debtor
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601.500.5533

06/16/2025
Date

3. Mailing address for filing responses:

Jackson Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Thad Cochran US Courthouse
501 E Court St, Ste 2.300
Jackson, MS 39201

Gulfport Divisional Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Dan M. Russell, Jr. U.S. Courthouse
2012 15th St, Suite 244
Gulfport, MS 39501

CERTIFICATE OF SERVICE

On June 16, 2025, a copy of this pleading was served on each of the persons listed on the attached service list either by prepaid United States mail or via electronic service through the Court's EM/ECF system at the mailing addresses and/or email addresses indicated.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

1
2
3
4 **UNITED STATES BANKRUPTCY COURT**
5 **SOUTHERN DISTRICT OF MISSISSIPPI**

6 IN RE:
7 MATTIE NELL MCGEE

8 CASE NO: 20-51055-KMS
9 **DECLARATION OF MAILING**
10 **CERTIFICATE OF SERVICE**

11 Chapter: 13

12 On 6/16/2025, I did cause a copy of the following documents, described below,

13 Notice and Motion for Entry of Chapter 13 Discharge

14
15
16
17
18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
20 incorporated as if fully set forth herein.

21 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
22 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
23 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
fully set forth herein.

24 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
25 served electronically with the documents described herein per the ECF/PACER system.

26 DATED: 6/16/2025

27 /s/ Thomas C. Rollins, Jr.
28 Thomas C. Rollins, Jr.
 Attorney at Law
 The Rollins Law Firm
 702 W. Pine Street
 Hattiesburg, MS 39401
 601 500 5533
 trollins@therollinsfirm.com

1
2
3 **UNITED STATES BANKRUPTCY COURT**
4 **SOUTHERN DISTRICT OF MISSISSIPPI**

5 IN RE:
6 MATTIE NELL MCGEE

7 CASE NO: 20-51055-KMS
8 **CERTIFICATE OF SERVICE**
9 **DECLARATION OF MAILING**

10 Chapter: 13

11 On 6/16/2025, a copy of the following documents, described below,
12 Notice and Motion for Entry of Chapter 13 Discharge

13
14
15
16
17
18
19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
herein.

21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
Service and that it is true and correct to the best of my knowledge, information, and belief.

23 DATED: 6/16/2025

24 
25

26 Miles Wood
27 BK Attorney Services, LLC
28 d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
 NCRS ADDRESS DOWNLOAD
 CASE 20-51055-KMS
 SOUTHERN DISTRICT OF MISSISSIPPI
 MON JUN 16 9-59-58 PST 2025

(P) JEFFERSON CAPITAL SYSTEMS LLC
 PO BOX 7999
 SAINT CLOUD MN 56302-7999

EXCLUDE

~~US BANKRUPTCY COURT~~
~~DAN M RUSSELL JR US COURTHOUSE~~
~~2012 15TH STREET SUITE 244~~
~~GULFPORT MS 39501 2036~~

CHASE CARD SERVICES
 PO BOX 15369
 WILMINGTON DE 19850-5369

DISCOVER BANK
 DISCOVER PRODUCTS INC
 PO BOX 3025
 NEW ALBANY OH 43054-3025

(P) DISCOVER FINANCIAL SERVICES LLC
 PO BOX 3025
 NEW ALBANY OH 43054-3025

EXCLUDE

~~(D) (P) JEFFERSON CAPITAL SYSTEMS LLC~~
~~PO BOX 7999~~
~~SAINT CLOUD MN 56302 7999~~

JPMORGAN CHASE BANK NA
 SBMT CHASE BANK USA NA
 CO ROBERTSON ANSCHUTZ SCHNEID PL
 6409 CONGRESS AVENUE SUITE 100
 BOCA RATON FL 33487-2853

NAVY FCU
 820 FOLLIN LANE
 VIENNA VA 22180-4907

NAVY FEDERAL CREDIT UNION
 PO BOX 3000
 MERRIFIELD VA 22119-3000

(P) PORTFOLIO RECOVERY ASSOCIATES LLC
 PO BOX 41067
 NORFOLK VA 23541-1067

SYNCHRONY BANK
 PO BOX 956005
 ORLANDO FL 32896-0001

US ATTORNEY GENERAL
 US DEPT OF JUSTICE
 950 PENNSYLVANIA AVENUE
 WASHINGTON DC 20530-0001

USDA RURAL DEVELOPMENT
 PO BOX 66801
 SAINT LOUIS MO 63166-6801

USDA RURAL DEVELOPMENT
 CO US ATTORNEY
 501 E COURT ST
 STE 4401
 JACKSON MS 39201-5022

EXCLUDE

~~UNITED STATES TRUSTEE~~
~~501 EAST COURT STREET~~
~~SUITE 6 430~~
~~JACKSON MS 39201 5022~~

EXCLUDE

~~(P) DAVID RAWLINGS~~
~~ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE~~
~~PO BOX 566~~
~~HATTIESBURG MS 39403 0566~~

DEBTOR

MATTIE NELL MCGEE
 PO BOX 424
 COLLINS MS 39428-0424

EXCLUDE

~~THOMAS CARL ROLLINS JR~~
~~THE ROLLINS LAW FIRM PLLC~~
~~PO BOX 13767~~
~~JACKSON MS 39236 3767~~